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February 23, 2000

Office of the Branch Chief
Processed Products Branch, Fruit and Vegetable Division,
Agricultural Marketing Service, U.S. Department of Agriculture
Room 0709, South Building
P.O. Box 96456
Washington, D.C. 20090-6456

RE: United States Standards for Grades of Frozen Okra, Discussion Draft

The American Frozen Food Institute (AFFI) is the national trade association representing frozen food processors, suppliers, and marketers. AFFI's more than 550 member companies account for over 90 percent of frozen food production in the United States, valued at approximately \$60 billion. AFFI members are located throughout the country and are engaged in the manufacture, processing, transportation, distribution, and sale of products nationwide. AFFI's Western Technical Advisory Committee (WTAC) includes among its members almost all frozen okra processors in the United States and therefore is uniquely qualified to provide input on the above-referenced grade standard.

AFFI has reviewed the proposed discussion draft standard for frozen okra and commends the Processed Products Branch, Fruit and Vegetable Division, for its efforts to revise grade standards to meet the needs of the frozen fruit and vegetable industry. AFFI especially appreciates the opportunity to work with the Agency to craft a standard which will benefit sellers and purchasers of frozen okra.

As you may be aware, AFFI petitioned the Agricultural Marketing Service (AMS) in July, 1995, for an emergency final rule to revise the frozen okra standard. In December, 1995, the Agency published an interim final rule which addressed the industry's concerns about the trimming of pods. AFFI is pleased the Fruit and Vegetable Division considered and incorporated the frozen okra processors' recommendations.

AFFI supports the USDA-proposed revised standard for frozen okra. The Institute, however, would like to submit several recommendations and/or questions which we believe will assist in strengthening the standard.

§52.1514 **Definition of terms.**

Discussion Draft: (g) **Extraneous vegetable matter (EVM)** [formerly harmless extraneous vegetable material (HEVM)] consists of leaves, attached inedible stems in excess of one-half inch, detached stems (any length), and similar harmless plant material.

AFFI Comment: AFFI questions how "inedible stem" relates to the EVM which includes "attached stem in excess of one-half inch?" The Agency may wish to clarify whether the inedible stems are shorter or tougher and whether a unit can be both an EVM and an inedible stem.

Discussion Draft: (o) **Small piece**

- (1) **Small piece in whole style** means a piece of pod (exclusive of very small tip ends) which is one-fourth or less the weight of the smallest whole pod in the sample unit.

AFFI Comment: AFFI questions the definition of "very small tip ends." AFFI suggests this term be defined or deleted.

- (2) **Small piece or damaged piece in cut style** means any piece of pod one-fourth inch or less in length, or units that may be broken, mashed, split, shattered, or improperly or incompletely cut so as to noticeably affect the appearance or edibility of the unit.

AFFI Comment: AFFI recommends that "Small piece in cut style" be a separate category and "damaged piece" come under "mechanical damage." Further small pieces should include poorly trimmed pieces, and should permit 12 units or 12 percent (similar to the U.S. standard of October 15, 1996).

Discussion Draft: (r) **Tough fiber** means any cooked unit that contains tough fibrous development including inedible caps, to the extent that the eating quality of the unit is materially affected. Inedible cap means a cooked unit with attached portions of the cap that are inedible.

AFFI Comment: Section (r) on page seven of the draft appears to be redundant with sections (i) and (j) on page six. AFFI recommends deleting Section (r).

le IV. Frozen Okra, Cut Style

Discussion Draft: Small pieces and damaged pieces

I Comment: AFFI questions whether small pieces in cut okra are scored by count or by weighing whole units from the pieces. Five flakes in a cut style would be a tight standard. Five percent by weight would be an acceptable level.

I appreciate the opportunity to comment on the proposed frozen okra standard and offers additional assistance we may provide.

Sincerely

A handwritten signature in cursive script, appearing to read "Leslie G. Sarasin".

Leslie G. Sarasin, CAE
President and
Chief Executive Officer